

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: John T. Huboky and Joann A. Huboky, Co-Debtor	Chapter: 13
Debtor	Bankruptcy No.: 19-13844-amc
	11 U.S.C. § 362

U.S. Bank Trust National Association, as Trustee of  
Dwelling Series IV Trust

Movant

vs.

John T. Huboky and Joann A. Huboky, Co-Debtor

Debtor

and

Scott F. Waterman (Chapter 13), Esquire

Trustee

RESPONDENTS

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DEADLINE**

U.S. Bank Trust National Association, as Trustee of Dwelling Series IV Trust, has filed a Motion for Relief from the Automatic Stay in order to foreclose or resume foreclosure on the real property situated at 252 Virginia Avenue, Folsom, PA 19033.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before 07/06/2022 you or your attorney must do all of the following:

- (a) File an answer explaining your position at:  
Eastern District of Pennsylvania-Philadelphia Division  
Robert N.C. Nix Federal Courthouse  
900 Market Street - Courtroom 4  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:  
**Michael Clark**  
**Richard M. Squire & Associates, LLC**  
**115 West Avenue, Suite 104**  
**Jenkintown, PA 19046**  
**Phone: (215) 886-8790**  
**Fax: (215) 886-8791**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A telephonic hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on 07/20/2022 at 11:00 am pursuant to Standing Order 20-3003 dated March 16, 2020. Parties may participate in the telephonic hearing by calling (877) 336-1828 and entering access code 7855846.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Michael Clark  
Richard M. Squire, Esq.  
M. Troy Freedman, Esq.  
Michael J. Clark, Esq.  
One Jenkintown Station, Suite 104  
115 West Avenue  
Jenkintown, PA 19046  
215-886-8790  
215-886-8791 (FAX)  
[rsquire@squirelaw.com](mailto:rsquire@squirelaw.com)  
[tfreedman@squirelaw.com](mailto:tfreedman@squirelaw.com)  
[mclark@squirelaw.com](mailto:mclark@squirelaw.com)

Dated: June 22, 2022